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11 COUNTRYWIDE BANK, N.A. and NAZIA NAWABZADA

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20 Attorneys for Plaintiffs  
21 ROSA GALINDO and MARIA GALINDO

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

ROSA GALINDO, MARIA GALINDO,

Case No. C07-03991

Plaintiffs,

vs.

FINANCO FINANCIAL, INC.;  
PATRICK PATCHIN; AHMED YAMA  
ASEFI, AAROON SADAT, NAZIA  
NAWABZADA, COUNTRYWIDE  
BANK, N.A.; JOSEPH ESQUIVEL,  
PAMELA SPIKES AND DOES 1-100,

**JOINT STIPULATION RE  
EXTENDING TIME TO ANSWER  
COMPLAINT AND [PROPOSED]  
ORDER**

Defendants.

PURSUANT TO CIVIL LOCAL RULE 6-2, Plaintiffs ROSA GALINDO  
and MARIA GALINDO, and Defendants COUNTRYWIDE BANK, N.A. and  
NAZIA NAWABZADA, through their undersigned counsel of record, hereby

1 stipulate as follows:

2 WHEREAS, Plaintiffs filed this action in the Superior Court of California,  
3 County of Alameda, on June 29, 2007;

4 WHEREAS, on August 2, 2007, Defendants Countrywide N.A. and Nazia  
5 Nawabzada filed a Notice of Removal, removing this action to the United States  
6 District Court for the Northern District of California;

7 WHEREAS, Plaintiffs and Defendants stipulated to an extension for  
8 Defendants to answer the Complaint, to and including September 14, 2007;

9 WHEREAS, Defendants are now substituting in new counsel of record;

10 WHEREAS, Plaintiffs and Defendants agree that judicial economy and the  
11 interests of the parties in avoiding unnecessary expenses would be served and  
12 promoted by briefly continuing Defendants' time to answer the Complaint; and

13 WHEREAS, continuing Defendants' time to answer the Complaint as  
14 stipulated below will not alter any other dates scheduled in this action;

15 IT IS HEREBY STIPULATED AND AGREED by Plaintiffs and Defendants,  
16 subject to the approval of the Court, that the last day for Defendants Countrywide  
17 Bank, N.A., and Nazia Nawabzada to answer the Complaint is continued to and  
18 including October 4, 2007.

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1 Plaintiffs and Defendants respectfully request the Court to approve the  
2 stipulation to extend Defendants' time to answer the Complaint.  
3

4 Dated: September \_\_\_, 2007

5 **WELTIN LAW OFFICE, P.C.**  
6 PHILIP R. WELTIN  
7 DANIEL R. WELTIN

8 By: \_\_\_\_\_  
9

10 Daniel R. Weltin  
11  
12 Attorneys for Plaintiffs Rosa Galindo  
13 and Maria Galindo

14 Dated: September 13, 2007

15 **BRYAN CAVE LLP**  
16 JOHN W. AMBERG  
17 HEATHER S. ORR

18 By: \_\_\_\_\_  
19

20 John W. Amberg  
21 Attorneys for Defendants Countrywide  
22 Bank, N.A. and Nazia Nawabzada

23 **[PROPOSED] ORDER**

24 Based on the foregoing and good cause appearing therefor, it is ordered:

25 Defendants Countrywide Bank, N.A. and Nazia Nawabzada shall have to and  
26 including October 4, 2007 in which to answer the Complaint.

27 IT IS SO ORDERED.

28 Dated: September 18, 2007

  
DISTRICT JUDGE EDWARD M. CHEN

1 Plaintiffs and Defendants respectfully request the Court to approve the  
2 stipulation to extend Defendants' time to answer the Complaint.  
3

4 Dated: September 13, 2007

WELTIN LAW OFFICE, P.C.  
PHILIP R. WELTIN  
DANIEL R. WELTIN

7 By: 

8 Daniel R. Weltin  
9 Attorneys for Plaintiffs Rosa Galindo  
10 and Maria Galindo  
11

12 Dated: September \_\_\_, 2007

13 BRYAN CAVE LLP  
14 JOHN W. AMBERG  
15 HEATHER S. ORR

16 By: \_\_\_\_\_  
17 John W. Amberg  
18 Attorneys for Defendants Countrywide  
19 Bank, N.A. and Nazia Nawabzada  
20

**[PROPOSED] ORDER**

21 Based on the foregoing and good cause appearing therefor, it is ordered:  
22 Defendants Countrywide Bank, N.A. and Nazia Nawabzada shall have to and  
23 including October 4, 2007 in which to answer the Complaint.

24 IT IS SO ORDERED.

25 Dated: \_\_\_\_\_

26 DISTRICT JUDGE EDWARD M. CHEN  
27  
28

## PROOF OF SERVICE

Rosa Galindo, et al. v. Financo Financial, Inc., et al.  
Case No.: C07-03991

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My e-mail address is [jccchiri@bryancave.com](mailto:jccchiri@bryancave.com).

On September 14, 2007, I caused the following document(s) described as: **JOINT STIPULATION RE EXTENDING TIME TO ANSWER COMPLAINT AND [PROPOSED] ORDER**; to be served upon each interested party in this action, as follows:

**VIA ELECTRONIC SERVICE – CRC 2060(c)** The document was served via electronic transfer by ECF upon the recipients designated on the transaction receipt located on the ECF website. Each transmission was reported as complete and without error.

Executed on September 14, 2007, at Santa Monica, California. I declare under penalty of perjury that the foregoing is true and correct.

/s/ Judith C. Chiri  
Judith C. Chiri

**Bryan Cave LLP**  
120 Broadway, Suite 300  
Santa Monica, California 90401-2386